

# **Exhibit 2**

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Attorneys for Defendant  
Bitmain Technologies, Ltd.

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO**

GOR GEVORKYAN, on behalf of  
himself and all others similarly situated,

Plaintiff,

v.

BITMAIN, INC., BITMAIN  
TECHNOLOGIES, LTD. and DOES 1  
to 10,

Defendants.

Case No. 3:18-cv-07004-JD

**DEFENDANT BITMAIN  
TECHNOLOGIES, LTD.'S  
NOTICE OF DEPOSITION OF  
GOR GEVORKYAN AND  
REQUESTS FOR PRODUCTION  
OF DOCUMENTS**

Date: March 5, 2020  
Time: 9:00 a.m.  
Place: O'Melveny & Myers, LLP  
400 South Hope St.  
18th Floor  
Los Angeles, CA 90071

**ATTACHMENT A**

**REQUEST FOR PRODUCTION NO. 1:**

Documents that Refer, Relate to, or Discuss Your purchases of the Devices that are the subject of this Action.

**REQUEST FOR PRODUCTION NO. 2:**

Documents that evidence Your purchase of the Devices that are the subject of this Action, including any purchase receipts, invoices, emails, email confirmations, order forms, credit card statements, canceled checks, and bank statements.

**REQUEST FOR PRODUCTION NO. 3:**

Communications between You and any Person, including Bitmain, Bitmain employees, or third parties, that Refer, Relate to, or Discuss Your purchases of the Devices that are the subject of this Action.

**REQUEST FOR PRODUCTION NO. 4:**

Communications between You and Bitmain or between You and any company that You believe to be a Bitmain-related entity.

**REQUEST FOR PRODUCTION NO. 5:**

Communications between You and anyone at the San Jose, California office that You refer to in Your Opposition. (ECF No. 37 at 1-2, 5-7, 9, 11-13, 15.)

**REQUEST FOR PRODUCTION NO. 6:**

Documents that support Your statement in paragraph 2 of Your Declaration that You have been “at all times relevant to this action . . . a citizen of Burbank, California.” (ECF No. 37-1 ¶ 2.)

**REQUEST FOR PRODUCTION NO. 7:**

Documents that support Your statement in paragraph 5 of Your Declaration that You “made the purchases of all of the mining devices from Burbank, California.” (ECF No. 37-1 ¶ 5.)

**REQUEST FOR PRODUCTION NO. 8:**

Documents that support Your statement in paragraph 13 of Your Declaration that You visited “Bitmain’s website” and found and called a “standard United States phone number” to discuss Your Devices with customer service representatives. (ECF No. 37-1 ¶ 13.)

**REQUEST FOR PRODUCTION NO. 9:**

Documents You Identify in Your response to Interrogatory number 3 in Bitmain’s First Set of Interrogatories to Plaintiff Gor Gevorkyan.

**REQUEST FOR PRODUCTION NO. 10:**

Documents You Identify in Your response to Interrogatory number 4 in Bitmain’s First Set of Interrogatories to Plaintiff Gor Gevorkyan.

**REQUEST FOR PRODUCTION NO. 11:**

Documents You Identify in Your response to Interrogatory number 5 in Bitmain’s First Set of Interrogatories to Plaintiff Gor Gevorkyan.

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1 Dated: January 21, 2020

/s/ Carlos M. Lazatin

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3 Carlos M. Lazatin  
4 William K. Pao  
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